

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)
Plaintiff,) Cr. No. _____
v.) 18 U.S.C. § 1344
SANDRA PATTERSON,) 18 U.S.C. § 1341
Defendant.) 18 U.S.C. § 2

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT 1

1. At all times relevant herein, Bank of America is a financial institution with deposits insured by the Federal Deposit Insurance Corporation.
2. Beginning on or about July 22, 2004, and continuing until on or about August 20, 2004, the defendant, **SANDRA PATTERSON**, hereinafter referred to as "defendant," and others known and unknown to the Grand Jury, did knowingly execute and attempt to execute a scheme and artifice to defraud, and to obtain monies, funds, assets, and other property under the custody and control of Bank of America, a financial institution, by means of false and fraudulent pretenses and representations.
3. The scheme and artifice to defraud and obtain monies, funds, assets, and other property by means of false and fraudulent pretenses and representations so devised and intended to be devised by the defendant was in substance as follows:
 - a. It was a part of the scheme and artifice that a person unknown to the Grand Jury entered the Bank of America located at 6186 Stage Road, Bartlett, Tennessee, 38134

and assumed the identity of Ms. Alice Jackson, who was at that time ninety-one (91) years of age and resided in a nursing home in Arlington, Texas. The unknown individual requested a change of address on Alice Jackson's account.

b. It was further a part of the scheme and artifice that the unknown individual requested a change of address on Ms. Alice Jackson's account by presenting to a bank employee two forms of identification in order to confirm the change of address.

c. It was further a part of the scheme and artifice that persons unknown to the Grand Jury requested that the address on the account be changed to 4860 Fox Hall Drive, Apt. 7, Memphis, Tennessee. The unknown individual also requested the bank to mail an Automated Teller Machine (ATM) card and Personal Identification Number (PIN) to the same address.

d. It was further a part of the scheme and artifice that defendant and persons unknown to the Grand Jury received the ATM card and PIN number to the bank account.

e. It was further a part of the scheme and artifice that defendant fraudulently accessed the Bank of America account.

f. It was further a part of the scheme and artifice that defendant fraudulently withdrew funds in excess of \$25,000 from the Bank of America account.

4. On or about July 29, 2004, in the Western District of Tennessee, the defendant,

SANDRA PATTERSON

for the purpose of executing, and attempting to execute, the foregoing scheme and artifice, did withdraw \$1000 from the Bank of America checking account of Alice Jackson, in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT 2

5. The grand jury realleges all the allegations contained in Count One with the exception of those contained in paragraph 4.

6. On or about July 22, 2004, in the Western District of Tennessee, the defendant,

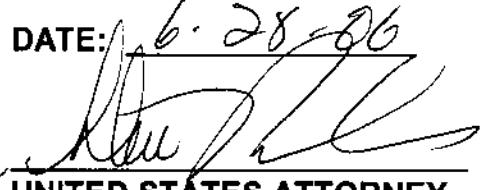
----- **SANDRA PATTERSON** -----

being aided and abetted, counseled, induced, and encouraged by persons known and unknown to the Grand Jury for the purpose of executing the foregoing scheme and artifice to defraud and attempting to do so, did knowingly place and cause to be placed in a post office box or an authorized depository for the mail matter to be sent and delivered by the United States Postal Service and did knowingly deposit and cause to be deposited, a letter containing a fraudulently obtained Automated Teller Machine card in the name of Alice Jackson to the address of 4860 Fox Hall Drive, Apt. 7, Memphis, Tennessee, in violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL

S/GRAND JURY FOREPERSON

DATE:

6-28-96


H.S. ST. JOHN
UNITED STATES ATTORNEY